

**DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX**

**OMNIBUS MOTION FOR (I) REFERRAL TO THE BANKRUPTCY JUDGE
PURSUANT TO RULE 5011-1 OF THE LOCAL RULES OF THE DISTRICT
COURT OF THE VIRGIN ISLANDS BANKRUPTCY DIVISION AND
(II) RECONSIDERATION OF ORDER ENTERED JULY 18, 2024,
PURSUANT TO DISTRICT COURT LOCAL RULE 7.3(a)(3)**

Limetree Bay Terminals, LLC d/b/a Ocean Point Terminals (“**Ocean Point**”), files this *Omnibus Motion for (I) Referral to the Bankruptcy Judge Pursuant to Rule 5011-1 of the Local Rules of the District Court of the Virgin Islands Bankruptcy Division and (II) Reconsideration of Order Entered July 18, 2024, Pursuant to District Court Local Rule 7.3(a)(3)* (this “**Motion**”) and states as follows:

Ocean Point respectfully requests that the Court enter an Order, in substantially the same form as attached hereto, **(i)** referring the above-captioned action (this “*Action*”) to the Bankruptcy Judge pursuant to Rule 5011-1 of the Local Rules of the District Court of the Virgin Islands Bankruptcy Division and **(ii)** pursuant to District Court Local Rule 7.3(a)(3), reconsider and vacate the Court’s Order entered July 18, 2024 at Docket Item 21 (the “*Magistrate Referral Order*”). In support of this Motion, Ocean Point relies on its supporting Memorandum of Law filed

contemporaneously herewith, any Reply in further support of the Motion, and any arguments adduced at oral argument or otherwise at any hearing or in any papers related to the Motion.

Statement Pursuant to LRCi 7.3(b). Pursuant to District Court Local Rule 7.3(b), Ocean Point respectfully states that, as more fully set forth in its accompanying Memorandum of Law, reconsideration of the Magistrate Referral Order is necessary to correct clear error or prevent manifest injustice because this Action arises in or is related to a case under title 11 of the United States Code and, thus, should automatically be referred to the Bankruptcy Judge consistent with relevant case law and policy underlying the Court's standing order of reference to the Bankruptcy Judge, as embodied in Local Bankruptcy Rule 5011-1.

Certification Pursuant to LRCi 7.3(c).

I express a belief, based on a reasoned and studied professional judgment, that the grounds for reconsideration set forth above are present in this case.

So Certified:

/s/ Mark W. Eckard

Respectfully submitted,

REED SMITH LLP

Dated: August 1, 2024

By: /s/ Mark W. Eckard
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